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GONG.IO, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

GONG.IO, INC.,

Case No. 5:25-cv-1026-NW

Plaintiff,

**JOINT STATEMENT REGARDING
HEARING ON MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED
COMPLAINT PURSUANT TO THE
COURT'S POLICY OF
ENCOURAGING OPPORTUNITIES
FOR JUNIOR LAWYERS**

HYPERCDOC INC. d/b/a RECALL.AI,
Defendant.

Judge: Hon. Noël Wise

Defendant Hyperdoc Inc. d/b/a Recall.ai (“Recall”) and Plaintiff Gong.io (“Gong”) hereby submit this joint statement regarding the hearing on Recall’s Motion to Dismiss the First Amended Complaint (“Motion”), which the Court has set for October 1, 2025.

In view of the Court’s Standing Order welcoming and encouraging oral argument by less-experienced attorneys,¹ the parties respectfully request that the Court consider holding oral argument on this Motion. Should the Court grant oral argument, counsel intends to have Joyce Li, an associate attorney with 7 years of experience, present argument on behalf of Recall, and Samantha Leff, an associate attorney with 3 years of experience and who has not previously argued in Federal Court, present argument on behalf of Gong.

Counsel also agree to mutually waive the “one attorney” rule and respectfully request that a more experienced attorney be allowed to assist the less experienced attorney during the argument, if needed to protect their respective client interests—which greatly assists counsel in persuading their clients to allow oral argument opportunities for less experienced attorneys.

Dated: September 26, 2025

MORRISON & FOERSTER LLP

By: /s/ Timothy Chen Saulsbury
Timothy Chen Saulsbury

Timothy Chen Saulsbury

Attorneys for Defendant
HYPERDOC INC. d/b/a RECALL.AI

¹ Standing Order for All Civil Cases Before District Judge Noël Wise, Section N (available at https://cand.uscourts.gov/wp-content/uploads/judges/wise-nw/NW-CivilStandingOrder_05-06-25.pdf).

1 Dated: September 26, 2025

ORRICK, HERRINGTON & SUTCLIFF LLP

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3 By: /s/ Clement S. Roberts

4 Clement S. Roberts

5 *Attorneys for Plaintiff*
GONG.IO, INC.

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1 **Attestation Re Electronic Signatures**

2 I, Timothy Saulsbury, attest pursuant to Northern District Local Rule 5-1(i)(3) that all
3 other signatories to this document, on whose behalf this filing is submitted, concur in the filing's
4 content and have authorized this filing. I declare under penalty of perjury under the laws of the
5 United States of America that the foregoing is true and correct.

6 Dated: September 26, 2025

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8 By: /s/ Timothy C. Saulsbury
9 Timothy C. Saulsbury

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